

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS TX 75202-2733

FEB 2 7 2015

GENERAL NOTICE LETTER -- URGENT LEGAL MATTER PROMPT REPLY NECESSARY, CERTIFIED MAIL: #7014 0150 0000 2452 7862 RETURN RECEIPT REQUESTED

The Lubrizol Corporation 29400 Lakeland Blvd Wickliffe, Ohio 44092

RE:

General Notice Letter for the CES Environmental Services, Inc.- Houston Superfund Site in

Houston, Harris County, Texas

Dear Sir/Madam:

The purpose of this letter is to notify you of your potential liability at the CES Environmental Services, Inc.-Houston Superfund Site (Site) and to invite you to join in settlement negotiations with the U.S. Environmental Protection Agency (EPA). The street address for the Site is 4904 Griggs Road, Houston, Harris County, Texas. The street addresses of the contiguous properties that are parts of the Site are 4900 Griggs Road and 5910 Wayland Street. The Site is surrounded by residential, educational and commercial properties. Based on available information, the EPA has determined that you may be responsible under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, for cleanup of the Site or costs the EPA has incurred in cleaning up the Site.

Explanation of Potential Liability

A Superfund Site is a place that is contaminated with hazardous substances at levels that may present a threat to human health or the environment. Under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, potentially responsible parties (PRPs) may be required to perform cleanup actions to protect the public health and welfare or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site. PRPs include current and former owners and operators of the Site, as well as persons who sent or transported hazardous substances to the Site for disposal or treatment or who arranged for the disposal or treatment of hazardous substances at the Site.

Under CERCLA, specifically Sections 106(a) and 107(a), PRPs may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site, unless the PRP can show divisibility of harm or any of the statutory defenses. PRPs include current and former owners and operators of a site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

You have been identified as a PRP who either sent hazardous substances for disposal or treatment to the Site or generated certain hazardous substances that the EPA has found at the Site. For this reason the attached General Notice concerning the removal action (Enclosure 1) is being sent to you. The General Notice requests your cooperation in conducting the on-going removal action at the Site and for reimbursement of past and future costs. Enclosure 2 contains copies of the documents used to identify you as a PRP. Enclosure 3 contains a list of the entities who are receiving this General Notice.

Site Background

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. Prior to the bankruptcy, the Site had been owned and operated by CES Environmental Services, Inc. The Site is now under the control of a Trustee for the Estate appointed by the Bankruptcy Court. The Estate does not have the funding necessary to address the conditions at the Site. The Site consists of approximately eleven vacuum boxes, two roll-off boxes, twelve frac tanks, two tanker trailers, 20 aboveground storage tanks, 15 waste water treatment tanks, waste piles, and numerous totes, vats, drums, and smaller containers. Additionally, there was spillage of chemicals to exterior surfaces as well as building interiors. The Site has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills have occurred due to vandalism which has resulted in the spillage of chemicals and waste to the ground surface and into an adjacent residential neighborhood. Removal is time critical per the Action Memo.

The information provided by the Estate's consultant shows that there are hazardous wastes along with various hazardous substances within containers located on the Site. The hazardous substances include but are not limited to benzene (D018), creosol (D023-026), 2,4,6-trichlorophenol (D042), pH (D002), ignitability (D001), MEK (D035), and 1,2-dichloroethane (D028). These chemicals are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14), and further defined at 40 C.F.R. 302.4.

Response Actions to Date

On or about September 3, 2014, the EPA mobilized its contractors to begin addressing the wastes and spills at the Site. The EPA's Time Critical Removal Action has addressed the following:

- 1. Management of stormwater to reduce off-site overflow of contaminated stormwater from the Site.
- 2. Removal of wastes from ten of twelve vacuum boxes and from two of two roll-off boxes.
- 3. Removal of wastes from eight of twelve frac tanks. Three frac tanks currently hold wastes.
- 4. Removal of liquid, i.e., pump able, wastes from eleven of twenty-three aboveground storage tanks (AST). Sludge and residual materials remain until sludge removal and tank cleaning of ASTs is completed.
- 5. Empty totes/drums have been segregated for temporary storage.
- 6. Waste piles dumped to the ground from the theft of seven roll-off boxes was removed by the Trustee.
- 7. Lab chemicals/company process samples were collected and disposed by the Trustee.
- 8. Process chemicals were collected and disposed by the Trustee.

Upon reviewing the enclosed General Notice, please provide a written response to Mr. Robert Werner, Enforcement Officer at 214-665-6724 within 60 calendar days after you receive this letter. Your response must identify of your intent to, or not to, enter into settlement negotiations with the EPA concerning this matter. Please mail your written response to Mr. Werner at the address that appears in the General Notice.

We look forward to working with you during the coming months.

Sincerely yours,

Carl E. Edlund, P.E.
Director

Superfund Division

Enclosures (4)

ENCLOSURE 1 GENERAL NOTICE REGARDING CES ENVIRONMENTAL SERVICES, INC.- HOUSTON HOUSTON, HARRIS COUNTY, TEXAS

This General Notice is from the U.S. Environmental Protection Agency (EPA). This General Notice is directed to you, the Potentially Responsible Party (PRP) of the CES Environmental Services, Inc.- Houston Site (Site). This General Notice does five things:

- 1. This General Notice tells you that you may be responsible for the presence of hazardous substances found at the Site. When we say "Site" or "property" in this General Notice, we mean the CES Environmental Services, Inc.- Houston Site. The street address for the Site is 4904 Griggs Road, Houston, Harris County, Texas. The street addresses of the contiguous properties that are parts of the Site are 4900 Griggs Road and 5910 Wayland Street. This General Notice is issued under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund).
- 2. This General Notice provides you with background information leading up to the EPA's investigation of the Site and the EPA's activities to determine the source(s) of the contamination at the Site.
- 3. This General Notice invites you to meet and enter a settlement with the EPA as a Settling Party regarding the cleanup of this Site and cooperation in conducting the on-going removal action at the Site and for reimbursement of past and future costs.
- 4. This General Notice advises you that, if you request the EPA to do so, the EPA will consider your ability to pay in determining an appropriate settlement amount.
- 5. This General Notice provides to you the names of all entities, i.e., PRPs, to which this General Notice will be mailed.

NOTICE THAT YOU MAY BE LIABLE

Under Section 107 of CERCLA, 42 U.S.C. § 9607, responsible parties are those who are current owners or operators of a facility, past owners or operators who owned or operated the facility at the time hazardous substances were released or disposed of at the facility, persons who arranged for disposal or treatment at the facility (usually the person(s) who generated the hazardous substance) or persons who selected that facility and transported the hazardous substances to the facility. Section 107 of CERCLA, 42 U.S.C. § 9607, states that responsible parties are liable to the United States for the costs it has incurred or will incur conducting a response action such as that proposed for the Site. A PRP is therefore responsible for performing the cleanup action in accordance with the EPA requirements, paying for the cleanup by the EPA and reimbursing the Federal Government for past and future costs of the cleanup activities.

BACKGROUND

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. Prior to the bankruptcy, the Site had been owned and operated by CES Environmental Services, Inc. The Site is now under the control of a Trustee for the Estate appointed by the Bankruptcy Court. The Estate does not have the funding necessary to address the conditions at the Site. The Site consists of approximately eleven vacuum boxes, two roll-off boxes, twelve frac tanks, two tanker trailers, twenty aboveground storage tanks, fifteen waste water treatment tanks, waste piles, and numerous totes, vats, drums, and smaller containers. Additionally, there is spillage of

chemicals to exterior surfaces as well as building interiors. The Site has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills have occurred due to vandalism which has resulted in the spillage of chemicals and waste to the ground surface and into an adjacent residential neighborhood. Emergency responses to these spills have involved the Estate, City of Houston, Texas Commission on Environmental Quality (TCEQ) and the EPA. These spill responses were addressed by TCEQ and the EPA.

The information provided by the Estate's consultant shows that there are hazardous wastes along with various hazardous substances within containers located on the Site. The hazardous substances include but are not limited to Benzene (D018), Creosol (D023-026), 2,4,6-Trichlorophenol (D042), pH (D002), Ignitability (D001), MEK (D035), and 1,2-Dichloroethane (D028). These chemicals are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14), and further defined at 40 C.F.R. 302.4.

Response Actions to Date

On or about September 3, 2014, the EPA mobilized its contractors to begin addressing the wastes and spills at the Site. As of December 19, 2014, the EPA Team has addressed the following:

- 1. Management of stormwater to reduce off-site overflow of contaminated stormwater from the Site.
- 2. Removal of wastes from ten of twelve vacuum boxes and from two of two roll-off boxes.
- 3. Removal of wastes from eight of twelve frac tanks. Three frac tanks currently hold wastes.
- 4. Removal of liquid, i.e., pump able, wastes from eleven of twenty-three aboveground storage tanks (AST). Sludge and residual materials remain until sludge removal and tank cleaning of ASTs is completed.
- 5. Empty totes/drums have been segregated for temporary storage.
- 6. Waste piles dumped to the ground from the theft of seven roll-off boxes was removed by the Trustee.
- 7. Lab chemicals/company process samples were collected and disposed by the Trustee.
- 8. Process chemicals were collected and disposed by the Trustee.

PARTICIPATION

The EPA is inviting you to enter into a settlement with the EPA. In addition to avoiding the costs of litigation, settling with the EPA provides you with another advantage. Under the Superfund law, settling with the EPA helps protect you should another responsible party sue you for costs which that party pays to the EPA. Also, if you choose not to settle with the EPA, then the EPA may take civil administrative action and, ultimately, the EPA may request civil judicial action. A list of entities receiving this General Notice letter is included as Enclosure 3 to this letter.

OPPORTUNITY TO MEET

The EPA will also provide you the opportunity to meet with the EPA representatives to discuss your desire to enter into a settlement with the EPA.

FINANCIAL CONCERNS/ABILITY TO PAY SETTLEMENTS

The EPA is aware the financial ability of some PRPs to contribute toward the cleanup and/or payment of response costs at a site may be substantially limited. If you believe and can document that you fall within that category, please contact Mr. Robert Werner at 214-665-6724 for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements. If the EPA concludes that you have a legitimate inability to pay the full amount of the EPA's costs, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that because the EPA has a potential claim against you, if your financial status changes in any significant way, i.e., filing for bankruptcy, you must include the EPA as a creditor.

RESOURCES AND INFORMATION FOR SMALL BUSINESSES

On January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at:

http://www.epa.gov/swerosps/bf/sblrbra.htm

and review the EPA guidance regarding these exemptions at:

http://www.epa.gov/compliance/resources/policies/cleanup/superfund

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers, which offer various forms of resources to small businesses. You may inquire about these resources at www.epa.gov.

In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/sbo. Finally, the EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA), which is enclosed with this letter (Enclosure 4).

YOUR RESPONSE TO EPA

Please notify Mr. Werner in writing at the address indicated below within 60 calendar days after you receive this letter to indicate your willingness to enter in good faith as a Settling Party. If the EPA does not receive your written response within 60 calendar days after you receive this letter, the EPA will assume you do not wish be a Settling Party and the EPA will then take whatever actions are necessary to abate the potential threat to human health and the environment posed by contaminants on the property.

Your response to this letter should be directed to:

Mr. Robert Werner Enforcement Officer (6SF-TE) United States Environmental Protection Agency Region 6 1445 Ross Avenue Dallas, Texas 75202 Telephone: 214-665-6724, Fax: 214-665-6660

werner.robert@epa.gov

If you or your attorney have legal questions pertaining to this matter, please direct them to:

Ms. Amy Salinas
Assistant Regional Counsel (6RC-S)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202
Telephone: 214-665-8063, Fax: 214-665-6460

salinas.amy@epa.gov

The discussions of fact or law in this General Notice are meant to help you understand CERCLA and the EPA's actions at the Site. The discussions of fact and law are not final positions on any matter discussed in this General Notice.

ENCLOSURE 2 GENERAL NOTICE REGARDING CES ENVIRONMENTAL SERVICES, INC.- HOUSTON HOUSTON, HARRIS COUNTY, TEXAS

EVIDENTIARY DOCUMENTATION

SAMPLES OF EVIDENCE

Enclosed are copies of samples of documented evidence that identifies the name of your company. The examples are not intended to represent all the evidence in CES records. It is only a representative sample that identifies:

- 1. A waste hazardous substance that was generated by your company and was transported to the Site for disposal and/or recycling, or
- 2. A waste hazardous substance that was generated by your company and that was transported in a CES tanker trailer to a facility other than the Site for disposal and/or recycling. The EPA believes that residue of the waste hazardous substance that had been transported in the CES tanker trailer was released at the Site when the interior of the CES tanker trailer was cleaned at the Site.

uhrizol

From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397

Charges are to be: Prepaid

C/O Ryder Transportation

Send Freight bill to:

Lubrizol

Suite 101

Management 39550 13 Mile Road

Novi, MI 48377

FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night

For call originating outside of the U.S: 703-527-3887 Washington,DC Collect

STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE

Received, subject to individually determined rates or contracts that have been agree upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.

Page 1 Of 1

Route: CES ENVIRONMENTAL

SERVICES INC

Car/Container #: CES 235 Seal Numbers:

Delivery Date: July 30, 2008

Ship Date: July 30, 2008

Delivery number: 81053923 Order Number:

Customer Reference No.:

Booking Number: Steamship Line: Vessel: Cut off Date

Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506

Pier Address:

The property described below, in apparent good order, except as noted(contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier(the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth(1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or(2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG

Quantity/ Unit	НМ	Description of Materials. Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)
46,080 46,080		LIQUID CAUSTIC SOLUTION ****Totals**** ENVIRONMENTALLY HAZARDOUS SUPETANCE LIQUID N.C.S.		0
		ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID, N.O.S., (SODIUM HYDROXIDE), 9, UN3(82, PG III, RO, (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPONATION. DRIVER'S INITIALS	SE INFOR	RM

Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.

The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents. dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.

of Lading approved by the Interstate Commerce Commission). The Fibre containers used for this shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and other lawful charges. all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Signature: RON BEESON

Where the rates on any of the items listed above are (Shippers imprint in lieu of stamp; not a part of Bill Subject to section 7 of conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and

(Signature of Consignor)

I Hereby declare that the contents of this consignment are Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency fully and accurately described above by the proper shipping response information was made available and/or carrier has the DOT emergency response classified, packaged, marked and guidebook or equivalent document in the vehicle. HAZMAT SECURED name(s), and labelled/placarded, and are in all respects in prope condition for transport according to the applicable international and national governmental regulation.

PRO Number:

Name of Carrier: SERWICES INC

Shipper: The Lubrizol Corporation (U.S.) Prepared On: July 30, 2008

Per: RON BEESON

Per:

From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397 Charges are to be: Prepaid Send Freight bill to: Lubrizol

C/O Ryder Transportation

Management 39550 13 Mile Road

Novi, MI 48377

Suite 101

FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night

For call originating outside of the U.S: 703-527-3887 Washington, DC Collect/

STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE

Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.

Page 1 Of 1

Route:	CES	ENVIRONMENTAL
SERVI	CES	INC

Car/Container #: CES 235 Seal Numbers:

Delivery Date: July 30, 2008

Ship Date: July 30, 2008

Delivery number: 81053920 Order Number:

Customer Reference No.:

Booking Number: Steamship Line: Vessel: Cut off Date

Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 USA

Pier Address:

The property described below, in apparent good order, except as noted(contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier(the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed beceunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth(1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or(2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG

E Quantity/ Unit	НМ	Description of Materials. Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)
46,380 46,380		LIQUID CAUSTIC SOLUTION ****Totals**** ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID N O S		0
		ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID, N.O.S., (SODIUM HYDROXIDE), 9, UN309219G III, RO, (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSEISSION OF EMERGENCY RESPONATION. DRIVER'S INITIALS (147)	SE INFO	RM
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Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.

The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents. dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.

set forth in the box makers certificate thereon, and other lawful charges. all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Signature: RON BEESON

Where the rates on any of the items listed above are (Shippers imprint in lieu of stamp; not a part of Bill Subject to section 7 of conditions of applicable Bill of Lading. If this of Lading approved by the Interstate Commerce shipment is to be delivered to the consignee without recourse on the Commission). The Fibre containers used for this consignor, the consignor shall sign the following statement. The carrier shipment, if applicable, conform to the specification shall not make delivery of this shipment without payment of freight and

(Signature of Consignor)

I Hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked and labelled/placarded, and are in all respects in prope condition for transport according to the applicable international and national governmental regulation

Shipper: The Lubrizol Corporation (U.S.) Prepared On: July 30, 2008

Per: RON BEESON

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED

CES ENVIRONMENTA

PRO Number

FOR CHEMICAL EMERGENCY . STRAIGHT BILL OF LADING SHORT FORM Spill, Leak, Fire, Exposure or Accident ORIGINAL - NOT NEGOTIABLE Call CHEMTREC 1-800-424-9300 Received, subject to individually determined rates or contracts that have been agreed Day or Night upon in writing between the carrier and shipper, if applicable, otherwise to the From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397 For call originating outside of the U.S: rates, classifications and rules that have been established which govern the 703-527-3887 Washington,DC Collect transportation of this shipment. Route: CES ENVIRONMENTAL Ship Date: July 09, 2008 Page 1 Of 1 SERVICES INC Charges are to be: Prepaid Delivery Date: July 12, 2008 Delivery number: 81040874 Order Number: Send Freight bill to: Car/Container #: CES-243 Lubrizol Seal Numbers: C/O Ryder Transportation Customer Reference No.: Management 39550 13 Mile Road **Booking Number:** Suite 101 Steamship Line: Novi, MI 48377 Vessel: Cut off Date: Consigned to: Pier Address: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506 The property described below, in apparent good order, except as noted(contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier(the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth(1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or(2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG Quantity/ HM Description of Materials. Special Marks, and Instructions Flash Weight(lbs.) Point(°C) Unit 43,160 LIQUID CAUSTIC SOLUTION 0 ****Totals**** 43,160 0 ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID, N.O.S (SODIUM HYDROXIDE), 9, UN3082, PG NI, RO, (0406.3 WASHWATE DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESP ATION. DRIVER'S INITIALS

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The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents. Where the rates on any of the items listed above are (Shippers imprint in lieu of stamp; not a part of Bill Subject to section 7 of conditions of applicable Bill of Lading. If this dependent on value, the agreed or declared value of the of Lading approved by the Interstate Commerce shipment is to be delivered to the consignee without recourse on the property is hereby specifically stated by the shipper to be Commission). The Fibre containers used for this consignor, the consignor shall sign the following statement. The carrier the released value per article or per distribution package shipment, if applicable, conform to the specification shall not make delivery of this shipment without payment of freight and that results in the lowest transportation charges unless set forth in the box makers certificate thereon, and other lawful charges. otherwise specified. all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Signature: RON BEESON

(Signature of Consignor)

I Hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked an labelled/placarded, and are in all respects in prope condition for transport according to the applicable international and national governmental regulation.

Shipper: The Lubrizol Corporation (U.S.) Prepared On: July 09, 2008 Per: RON BEESON

PRO Number

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED

Name of Carrier:



From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397 FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300

Day or Night For call originating outside of the U.S: 703-527-3887 Washington,DC Collect

STRAIGHT BILL OF LADING SHORT FORM **ORIGINAL - NOT NEGOTIABLE**

Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.

Route: CES ENVIRONMENTAL

SERVICES INC

Ship Date: September 05, 2008 Delivery Date: September 02, 2008 Page 1 Of 1

Charges are to be: Prepaid

Send Freight bill to: Lubrizol C/O Ryder Transportation

Management 39550 13 Mile Road Suite 101 Novi, MI 48377

Car/Container #: 235 CES Seal Numbers:

Delivery number: 81077777

Order Number:

Customer Reference No.:

Booking Number: Steamship Line: Vessel: Cut off Date:

Pier Address:

Consigned to: GULF COAST WASTE DISPOSAL AUTHORITY WASHBURN TUNNEL FACILITY 1002 N. RICHEY STREET PASADENA TX 77506

USA

The property described below, in apparent good order, except as noted(contents and conditions of packages unknown), marked, consigned, and destined as indicated above, which said carrier(the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth(1) in Uniform Freight Classification, in effect on the date hereof, if this is a rail or a rail-water. Or(2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that it is familiar with all the terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted itself and its assigns. IT IS DECLARED THAT THE PACKING OF THE CONTAINER/VEHICLE HAS BEEN CARRIED OUT IN ACCORDANCE WITH PARAGRAPH 5.4.2.1 OF THE IMDG

E Quantity/ Unit	НМ	Description of Materials. Special Marks, and Instructions	Flash Point(°C)	Weight(lbs.)
44,220 44,220		LIQUID CAUSTIC SOLUTION ****Totals****		0
		ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID, N.O.S., (SODIUM HYDROXIDE), 9, UN3082, PG III, RO, (0406.3 WASHWATER) DRIVER ACKNOWLEDGES POSSESSION OF EMERGENCY RESPON ATION. DRIVER'S INITIALS	SE INFOR	M

Security Notice: All carriers will be required to have the delivery number or order number noted above and a valid commercial drivers license upon arrival to the Lubrizol facility. Failure to be able to supply both items will result in the carrier service being rejected, until the information is provided.

The correct weight is as shown above subject to verification in accordance with any applicable agreement with carriers or their authorized agents,

dependent on value, the agreed or declared value of the property is hereby specifically stated by the shipper to be the released value per article or per distribution package that results in the lowest transportation charges unless otherwise specified.

shipment, if applicable, conform to the specification set forth in the box makers certificate thereon, and other lawful charges. all other requirements of rule 41 of the Uniform Classification and Rules of the National Motor Freight Signature: RON BEESON

Where the rates on any of the items listed above are (Shippers imprint in lieu of stamp; not a part of Bill Subject to section 7 of conditions of applicable Bill of Lading. If this of Lading approved by the Interstate Commerce shipment is to be delivered to the consignee without recourse on the Commission). The Fibre containers used for this consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency

(Signature of Consignor)

I Hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and classified, packaged, marked labelled/placarded, and are in all respects in prope condition for transport according to the applicable international and national governmental regulation.

Shipper: The Lubrizol Corporation (U.S.) Prepared On: September 05, 2008 Per: RON BEESON

response information was made available and/or carrier has the DOT emergency response guidebook or equivalent document in the vehicle. HAZMAT SECURED

Name of Carrier: CES ENVIRONMENTAL SERVICES INC

PRO Number

Semion

From: The Lubric At: 12801 BAY	Ryder Transportation gement 13 Mile Road 101 MI 48377 gned to: F COAST WASTE DISPOSAL HBURN TUNNEL FACILITY N. RICHEY STREET DENA TX 77506 operty described below, in apparent the word carrier being understood threery at said destination, if on its route, or any portion of said route to destine terms and conditions of the Uniform the applicable motor carrier classificated in the terms and conditions of the Uniform the applicable motor carrier classificated forth in the classification or tariff assigns. IT IS DECLARED THAT THE UNITY HM 147,440 LIQU 47,440 LIQU ******]		FOR CHEMICAL EMERGENCY Spill, Leak, Fire, Exposure or Accident Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U.S: 703-527-3887 Washington,DC Collect Route: CES ENVIRONMENTAL		ident U.S:	SHORT FORM ORIGINAL - NOT NEGOTIABLE Received, subject to individually determined rates or contracts that have been a upon in writing between the carrier and shipper, if applicable, otherwise rates, classifications and rules that have been established which govern				LE that have been agre able, otherwise to
PASADENA,	11. 7/3	07-1397	The state of		BOWN .		September 29	2008	Pe	age 1 Of 1
Charges are to b	Dropo		SERVIC		1	•				ige I OI I
		ilu	Car/Con	tainer #: CES-L6731			te: September mber: 8109352		•	
Lubrizol			Seal Nur			Order Num		**		
C/O Ryder Trans Management	portation				1	Customer R	eference No.:			
39550 13 Mile Ro Suite 101 Novi, MI 48377	ad				1	Booking Nu Steamship I Vessel: Cut_off_Dat	ine:			353 865 8 2 3 3 3 4 3 3 3
WASHBURN TUR 1002 N. RICHEY	NNEL FA	CILITY	UTHORIT	Y	- 1 a a // to a contract 2 a	ddress:	e:	10-10		
carrier(the word carrier of delivery at said dest over all or any portion to all the terms and co Or(2) in the applicable lading, set forth in the and its assigns. IT IS	being unde ination, if o of said rou onditions of motor carri- classification	erstood through n its route, oth- te to destination the Uniform D er classification on or tariff whi	out this contra erwise to delive a, and as to er- comestic Straigl or tariff if the ch governs the	ct as meaning any person or er to another carrier on the re ach party at any time intereste in Bill of Lading set forth(1) it is is a motor carrier shipment.	corporation oute to said ed in all or in Uniform a. Shipper he ent, and the	in possession of destination. It is any of said pro Freight Classific ereby certifies the said terms and	the property und s mutually agreed perty, that every s ation, in effect on lat it is familiar w conditions are be	fer the contra , as to each of service to be in the date her with all the te ereby agreed	ct) agrees to ca carrier of all or performed here reof, if this is rms and conditi to by the shipp	rry to its usual pla any of said proper under shall be subjet a rail or a rail-wate ons of the said bill her and accepted its
Quantity/ Unit	НМ		Descr	iption of Materials. Sp	ecial Ma	rks, and Ins	tructions		Flash Point(°C)	Weight(lbs.)
47,440 47,440		****Total	als**** ONMENT M HYDR	ALLY HAZARDOU OXIDE) 9, UN3082 OWLEDGES COST	US SUE PG III ESSION	STANCE ,RQ,(0406 OF EME	LIQUID,N. 3 WASHW RGENCY F	.O.S. (ATER) RESPON	SE INFOI	0 RM
upon arrival to t information is pr	he Lubriz ovided. as shown ah any of the the agreed cifically sta article or	zol facility. ove subject to v items listed or declared val ted by the ship per distributio	Failure to refication in a above are (SI tue of the of opper to be Co n package shi ges unless all Ch	have the delivery num be able to supply both accordance with any applicable hippers imprint in lieu of stan Lading approved by the numission). The Fibre conta- ipment, if applicable, conform forth in the box makers ce other requirements of rule assification and Rules of the N	h items varieties agreement in a prince a prince ainers used in to the specificate the 41 of the	with carriers or art of Bill Subje Commerce ships for this consi ecification shall reon, and other	their authorized a ct to section 7 cannot is to be de gnor, the consigna not make delivery lawful charges.	service being seents. of conditions belivered to thor shall sign y of this ship	of applicable of applicable we consigned without perment without	until the Bill of Lading, If ithout recourse on statement. The car
labelled/placarded, an	scribed abor sified, pa d are in	ve by the prope ckaged, mark all respects	nment are Constitution of the constitution of	assification arrier acknowledges ret sponse information was uidebook or equivalent ame of Carrier: CES I	s made a document	vailable and in the vehi	or carrier ha	as the DO'	T emergency	

international and national governmental regulation.

Shipper: The Lubrizol Corporation (U.S.) Prepared On: September 29, 2008 Per: RON BEESON

EPAHO077002824

TASADEIA,	REA BLVD TX 77507-1397	Day or Night For call originating outside of t 703-527-3887 Washington,De		transportation of this shipment.				
	1A 1/307-1337	Route: CES ENVIRONMENT	TAL	Ship Date: June 23, 2008	Pr	age 1 Of 1		
Charges are to be		SERVICES INC		Delivery Date: June 02 , 2008				
Send Freight bill t Lubrizol	to:	Car/Container #: 235 CES Seal Numbers:		Delivery number: 81017935 Order Number:				
C/O Ryder Transp Management	portation			Customer Reference No.:				
39550 13 Mile Ro Suite 101 Novi, MI 48377	ad			Booking Number: Steamship Line: Vessel:				
Consigned to: GULF COAST W. WASHBURN TUN 1002 N. RICHEY PASADENA TX USA	NEL FACILITY STREET	AUTHORITY	Pier	Cut off Date: Address:				
carrier(the word carrier of delivery at said desting over all or any portion to all the terms and con Or(2) in the applicable is lading, set forth in the	being understood throu nation, if on its route, of said route to destinant ditions of the Uniform motor carrier classificati classification or tariff	ghout this contract as meaning any person otherwise to deliver to another carrier on the tion, and as to each party at any time inter Domestic Straight Bill of Lading set forth(on or tariff if this is a motor carrier shipm which governs the transportation of this ship	or corporation or corporation of course to see the course of the course	packages unknown), marked, consigned, and do in possession of the property under the contail destination. It is mutually agreed, as to each or any of said property, that every service to be m Freight Classification, in effect on the date hereby certifies that it is familiar with all the the said terms and conditions are hereby agree EN CARRIED OUT IN ACCORDANCE WITH Tarks, and Instructions	tract) agrees to ca th carrier of all or the performed herein thereof, if this is terms and condition to by the shipp	arry to its usual place any of said property under shall be subject a rail or a rail-water. ons of the said bill of er and accepted itself		
Oille				~~~~	roun(C)			
46,780 46,780	****TO	D CAUSTIC SOLUTION otals**** CONMENTALLY HAZARD JM HYDROXIDE), 9, UN30 R ACKNOWLEDGES POSITION OR DRIVER'S INITIALS	ous su 2 pg ii 2 sion	BSTANCE LIQUID, N.O.S., II,RQ,(0406.3 WASHWATER) N OF EMERGENCY RESPON	NSE INFOR	0 0		
upon arrival to the information is pro- The correct weight is as Where the rates on a	e Lubrizol facility vided. .shown shore subject to my of the items listed e agreed or declared ifically stated by the si article or per distribu	Failure to be able to supply be rerification in accordance with any applical above are (Shippers imprint in lieu of salue of the hipper to be Commission). The Fibre contion package shipment, if applicable, confe	oth items his agreementamp; not a e Interstate intainers use orm to the certificate ti	part of Bill Subject to section 7 of condition Commerce shipment is to be delivered to consignor, the consignor shall sign specification shall not make delivery of this shereon, and other lawful charges.	s of applicable B the consignee wit to the following s	until the		
I Hereby declare that the		Classification and Rules of the Classification.	National M	otor Freight Signature: RON BEESON packages and required placards. C	arrier certifies			
fully and accurately desc name(s), and classi- labelled/placarded, and condition for transport	fied, packaged, ma are in all respects	arked and guidebook or equivalen in proper	nt docume	available and/or carrier has the DO nt in the vehicle. HAZMAT SECU DIMENTAL SERVICES INC		response		
international and national Shipper: The Lubr Prepared On: June Per: RON BEESO	izol Corporation e 23, 2008	PRO Number:	V.A	1	(6:,	re - Not Initials)		

CES Environmental Services

TANK WASH WORK ORDER

Container / Tank Cleaning Division 4904 Griggs Rd. • Houston, TX 77021 Phoner (713) 676-1460 • Fax: (713) 676-1676

23085

PO # 73878 Customer:	CES			Date:	(.08
Tractor Address:				Time:	m.
Trailer / Container Number Dropped B	D. Raymin	d		Need By:	-
CONTAINER TYPE: TOTE BIN	ROLL DOOR BOX	ISO CONT	AINER [DRY BULK	
TANK TRAILER ROLL TAR	RP BOX	☐ FRAC TANK	POLY TAN	IK UVACI	JUM TRUCK
Compartment #	Last Contained	Heel - Hazardous	Heel - Non-Haz	Drum /	Rolloff
1 ,	Coden Alinn	Ac	L - L		
2					
3	lackort				
4				V 10 10 10 10 10 10 10 10 10 10 10 10 10	
5					
CLEANING CODES	WORK PERFORMED	N 289	TANK ENTRY	PERMIT	
1 Air Dry		Oxygen (19.5% -23.5	%) #1 <i>21.</i> 0#2	#3 #4	#5
2 Quick Rinse		LEL (<10%)	#1 #2		#5
3 Cold Water Rinse		CO ² (<35 ppm)	#12 #2	#3 #4	#5
4 Hot Water Rinse		Toxic Vapor	#1	#3 #4	#5
5 Steam Only (Per Hour)		Signature:	C		
6 Steam & Dry		Stripper Usage:			
7 Rinse, Steam & Dry					1988
8 Detergent Wash, Rinse & Dry	/	Comments:			
9 Caustic Wash & Dry] , , ,	1 0	-76	
10 Caustic Wash, Rinse & Dry		Libnz	odin P	-	
11 Waste Water Surcharge		L. A.	1 CAUSE	, t	*
12 Solvent Wash (Diesel # Hours)		0	, n	1 4	
13 Solvent Wash (Stripper)		2	3d.~ 1	100,000	
14 Exterior Tractor Wash		29			
15 Exterior Trailer Wash (w/o Internal)					
16 Exterior Trailer Wash (with Internal)					200 2 2
17 Exterior Acid Brite Wash		Authorized Addit	ional Services:		
18 Hand Labor (# Men / # Hours)					
19 Hydroblaster (# Hours)					
20 Solvent Wash (Green Stripper)					380
21 Passivation					
Hose Cleaning			-115		
Pump Cleaning Cleaned By:	Date(0-15-0}	thoroughness of the tank moisture. Final inspection of release CES Environmental from any allegations that CES Environmental S	Services, Inc., Cleaning Divise the equipment was impropervices, Inc., Cleaning Diviservices, Inc., Cle	total elimination of interio responsibility of the custo rision, from any responsit- terly cleaned, resulting in sion, is in no manner responsi-	r residues and/or mer, and they hereby olity for claims arising damage or loss.
Inspected By:		Print Name:	or losses of equipment and/	or materials left in their y	ard.
		Signature:			

From: The Lubrizol Corporation At: 12801 BAY AREA BLVD PASADENA, TX 77507-1397 Charges are to be: Prepaid Send Freight bill to: Lubrizol (10 Parker Transportation		oration	Spill, Leak, Fir Call (1-80 Day For call origina	CAL EMERGEN re, Exposure or Accide CHEMTREC 00-424-9300 y or Night ating outside of the U. 7 Washington,DC Col	ent	STRAIGHT BILL OF LADING SHORT FORM ORIGINAL - NOT NEGOTIABLE Received, subject to individually determined rates or contracts that have been agree upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established which govern the transportation of this shipment.				
	TX		Route: CES ENV SERVICES INC			Ship Date: October	7 , 2008	Pa	ge 1 Of 1	
		iid				Delivery Date: Octob		008		
			Car/Container #: Seal Numbers:							
39550 13 Mile Ro Suite 101 Novi, MI 48377	ad					Booking Number: Steamship Line: Vessel: Cut off Date:				
Consigned to: GULF COAST W. WASHBURN TUN 1002 N. RICHEY PASADENA TX USA	NEL FA	CILITY	THORITY		Pier A	The second secon				
carrier(the word carrier of delivery at said destin over all or any portion to all the terms and co Or(2) in the applicable lading, set forth in the and its assigns. IT IS I CODE. Quantity/	being und nation, if o of said rou nditions of motor carri classification	erstood throughout n its route, otherwise to destination, the Uniform Don fer classification of on or tariff which	t this contract as mean wise to deliver to anoth and as to each party in nestic Straight Bill of it reariff if this is a mon governs the transport CKING OF THE CON	ning any person or co her carrier on the rou at any time interested Lading set forth(1) in tor carrier shipment. Lation of this shipmen WTAINER/VEHICLE I	orporation ute to said I in all or I Uniform Shipper h It, and the HAS BEE!	kages unknown), marked, of in possession of the property destination. It is mutually any of said property, that of Freight Classification, in effereby certifies that it is fame said terms and conditions is CARRIED OUT IN ACCORDS, and Instructions	y under the contragreed, as to each every service to be ect on the date hillar with all the tare hereby agreed	act) agrees to cal carrier of all or performed heres ereof, if this is a terms and condition to by the shipp PARAGRAPH 5	rry to its usual p any of said prop inder shall be su a rail or a rail-wons of the said b er and accepted	
Unit				فسنحت				Point(°C)		
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upon arrival to the information is pro	e Lubriz vided.	zol facility. 1	failure to be able	e to supply both	items v	der number noted a vill result in the carr	ier service be			
The correct weight is as Where the rates on a dependent on value, the property is hereby specther released value per that results in the keotherwise specified.	any of the ne agreed of cifically state article or	items listed ab or declared value ted by the shippe per distribution	of the of Lading of Lading of the commission). package shipment, if set forth in all other re-	print in lieu of stamp approved by the Ir The Fibre contain applicable, conform the box makers cert quirements of rule and Rules of the Nat	p; not a ponterstate (ners used to the sptificate the	with carriers or their author ort of Bill Subject to section commerce shipment is to for this consignor, the co- cofification shall not make of even, and Uniform or Freight Signature: RON	n 7 of conditions be delivered to to onsignor shall sign delivery of this shapes.	the consignee with the following sipment without p	thout recourse o	
I Hereby declare that fully and accurately des name(s), and class labelled/placarded, and condition for transpe international and nation Shipper: The Lub	cribed aboverified, palare in ort accordal government	ve by the proper ckaged, marked all respects in ling to the ap- ental regulation.	shipping response i i and guidebook proper oplicable Name of PRO Name	cknowledges rece information was or equivalent d Carrier: CES El	made a locument	sackages and required vailable and/or carried in the vehicle. HA	r has the DO ZMAT SECU	T emergency		
Prepared On: Oct Per: RON BEESO	ober 17		Per:	ila)	Si	2men	()	(Signatur	re - Not Initi	

CES Environmental Services, Inc.

4904 Griggs Road Houston, TX 77021 Phone: (713) 676-1460 Fax: (713) 676-1676

Invoice

Date	Invoice #
9/29/2008	50051

(COPY

Bill To: The Lubrizol Corporation

Attn: Jan McClain 12801 Bay Area Blvd. Pasadena, TX 77507-1324

		P.O. No.	Terms	Pro	ject
		4500955487	Net 30	H =	*
Quantity	Description	10 Dr. 20420 - 12 See - 12	Manifest #	Rate	Amount
1	Transportation services by CES on 9/2/08		81077774	450.00	450.00
1	Transportation services by CES on 9/2/08		81068296	450.00	450.00
1	Transportation services by CES on 9/4/08		81077775	450.00	450.00
0.25	Demurrage @ \$69.00 per hour			69.00	17.25
1	Transportation services by CES on 9/4/08		81077776	450.00	450.00
0.25	Demurrage @ \$69.00 per hour			69.00	17.25
1	Transportation services by CES on 9/5/08		81077778	450.00	450.00
1	Transportation services by CES on 9/5/08	20 ¹⁰ 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	81077777	450.00	450.00
0.25	Demurrage @ \$69.00 per hour			69.00	17.25
1	Transportation services by CES on 9/6/08		81077779	450.00	450.00
0.25	Demurrage @ \$69.00 per hour			69.00	17.25
1	Transportation services by CES on 9/6/08		81079276	450.00	450.00
1	Transportation services by CES on 9/8/08	a 20 - 2	81079279	450.00	450.00
Ve appreci	ate your business!		Subtotal		
	ent Policy: Any unpaid balances begining on the		Sales Tax (8.	25%)	
	formalized contract.		Total		

From: The Lubriate 12801 BAY A PASADENA,	zol Corpo	oration .VD	FOR CHEMICAL EMERGEN Spill, Leak, Fire, Exposure or Accide Call CHEMTREC 1-800-424-9300 Day or Night For call originating outside of the U. 703-527-3887 Washington,DC Coll	Received, upon in S: rates, cl	ORIGINAL - NOT subject to individually determined writing between the carrier and	T FORM OT NEGOTIABLE sed rates or contrats that have been agreed of shipper, if applicable, otherwise to the have been established which govern the set of	
T HORDENIA,	111	-	Route: CES ENVIRONMENTAL	Ship D	ate: September 02 , 2008	Pa	age 1 Of 1
Charges are to b	o. Propo		SERVICES INC		y Date: August 31, 2008		•
Send Freight bill			Car/Container #: CES-235		v number: 81077774		
Lubrizol		1	Seal Numbers:		Number:		
C/O Ryder Trans Management	portation			Custon	er Reference No.:		
39550 13 Mile Ro Suite 101 Novi, MI 48377	oad				g Number: hip Line:		
Consigned to: GULF COAST W WASHBURN TU 1002 N. RICHEY PASADENA TX USA	NNEL FA	CILITY	THORITY	Pier Address:	Date.		
of delivery at said dest over all or any portion to all the terms and co Or(2) in the applicable lading, set forth in the and its assigns. IT IS CODE. Quantity/	ination, if o of said rou onditions of motor carri classification	in its route, otherwi- ite to destination, a the Uniform Dome- ier classification or on or tariff which	ise to deliver to another carrier on the rou nd as to each party at any time interested stic Straight Bill of Lading set forth(1) in tariff if this is a motor carrier shipment. S governs the transportation of this shipment	te to said destination in all or any of sa Uniform Freight C Shipper hereby cert , and the said term IAS BEEN CARRIL	n. It is mutually agreed, as to each id property, that every service to b lassification, in effect on the date if ifies that it is familiar with all the ns and conditions are hereby agree ED OUT IN ACCORDANCE WITH	n carrier of all or e performed here hereof, if this is terms and conditi d to by the shipp I PARAGRAPH 5	r any of said property under shall be subject a rail or a rail-water. ions of the said bill of eer and accepted itself 5.4.2.1 OF THE IMDG
Unit	-		-141-2-30-3			Polit(-C)	
44,740 44,740		LIQUID C	AUSTIC SOLUTION				150 A
		ENVIRON (SODIUM DRIVER A ATION. D	MENTALLY HAZARDOUS HYDROXIDE, 9, UN3082, I ACKNOWLEDGES ROSEES PRIVER'S INITIALS	S SUBSTAN PG III,RQ,(C SSION OF E	CE LIQUID, N.O.S., 406.3 WASHWATER) MERGENCY RESPON	NSE INFOI	RM
upon arrival to the information is pro-	he Lubriz ovided. s shown ab- any of the he agreed ocifically star- article or	zol facility. Fi	ailure to be able to supply both in accordance with any applicable at we are (Shippers imprint in lieu of stamp; of the to be Commission). The Fibre contain sackage unless set forth in the box makers certi- all other requirements of rule 4 Classification and Rules of the Nati-	terms will resu recement with cards not a part of Bill terstate Commerce ers used for this to the specification ficate thereon, and 1 of the Uniform	ers or their authorized agents. Subject to section 7 of condition shipment is to be delivered to consignor, the consignor shall sig shall not make delivery of this sl other lawful charges.	s of applicable in the consignee with the following an the following anipment without p	until the Bill of Lading. If this thout recourse on the statement. The carrier
I Hereby declare that fully and accurately de- name(s), and class	scribed above	EA 1995 Th 1/2		made available	and/or carrier has the DO	OT emergency	

Name of Carrier: CES ENVIRONMENTAL SERVICES INC

labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national governmental regulation.

Shipper: The Lubrizol Corporation (U.S.) Prepared On: September 02 , 2008 Per: RON BEESON

138383 Please print or type. (Form designed for use on elile (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039 UNIFORM HAZARDOUS 1. Generator ID Number 4. Manifest Tracking Numb 2. Page 1 of 3. Emergency Response Phone 862GBF TXD000642348 00037 281 479-2851 WASTE MANIFEST 5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address) The Lubrizol Corporation TCEQ SW Ident 30325 12801 Bay Area Blvd. (ATTN: Frank Hejtmanek) Pasadena, TX 77507-1397 Generator's Phone: 281 479-2851 7590 (24 HD EMEDGENCY CONTACT) U.S. EPA ID Numbe sealive TCEQ SW Ident 8. Designated Facility Name and Site Address U.S. EPA ID Number SYSTECH ENVIRONMENTAL CORPORATION TCEQ SW Ident: D0020 1420 SOUTH CEMENT ROAD KS0980633259 FREDONIA, KS 66736
Facility's Phone: (800) 778-7224 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11. Total 13. Waste Codes and Packing Group (if any)) HM No. Туре Quantity Wt.Vol. RQ, WASTE FLAMMABLE LIQUID, N.O.S., 3, 0021-206-н ф001 **GENERATOR** UN1993, PGII, (XYLENE, TOLUENE) 40160 1 TT P 14. Special Handling Instructions and Additional Information SYSTECH #CG142346 CLASS 3 PLACARDS REQUIRED. LDR REGUYRED USE PROTECTIVE EQUIPMENT WHEN HANDLING THIS WASTE. 15. GENERATOR'SIOFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Nar 06/10/09 Import to U.S. Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S. 17. Transporter Acknowledgment of Receipt of Materials TR ANSPORT 18, Discrepancy 18a. Discrepancy Indication Space Туре Residue Quantity Partial Rejection Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: GNATED 18c. Signature of Alternate Facility (or Generator) Month Day Year 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) nated Facility Owner or Opera r: Certification of receipt of hazardous materials covered by the manifest except as note in item 18a 20. Desk M(OI

700-22 (Rev. 3-05) Previous editions are obsolu

DESIGNATED FACILITY TO DESTMATION STATE (IF REQUIRED)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

P.O. Box 13087

Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

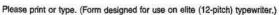


Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's U	JS EPA, ID No.	3 4 8 Do	Manifest	2. Pag of	mioni		the shaded are d by Federal la
3. Generator's Name and Mailing Address The Lubrizol Corporation 12801 Bay Area Blvd. (ATT Pasadena, TX 77507-1397 4. Generator's Phone (281 479-285	N: Frank He		EMERGENC	Y CONTA	B. Sta	te Manifest Do 377 te Generator's 30325	537	
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7. Transporter 2 Company Name	TAT EIRC		EPA ID Numi	1	F. Tra	te Transporter nsporter's Pho	ne	
9. Designated Facility Name and Site Add Vopak Industrial Services		10. US	EPA ID Numi	ber		ite Facility's ID 30567 cility's Phone		
2759 BATTLEGROUND ROAD DEER PARK, TEXAS 77536		TXDO	9 7 6 7	3. 1. 4. 9	COLUMN TERM	(281) 604	THE RESERVE OF THE PERSON NAMED IN	
11. US DOT Description (including Number and Packing Group)	1	1	class, ID	12. Contai No.	ners Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a RQ, WASTE FLAMMABLE UN1993, PGII, (XYLE					TT	3022) P	D001 0021-206-1
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY P.O. Box 13087

Austin, Texas 78711-3087





Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST 1. Generator's US E		ument No.	2. Page 1 of	is not	ition in the s required by	Federal law
3. Generator's Name and Mailing Address The Lubrizol Corporation 12801 Bay Area Bivd. (ATTN: Frank Heiti Pasadena. TX 77507-1397 4. Generator's Phone (281)479-2851 ext. 7590 5. Transporter 1 Company Name 6. CES ENVIRONMENTAL SERVICES. INC. 1. 7. Transporter 2 Company Name 8.	STATES AND	er CA CUM	B. State Gen	s 450 erator's II 3032 esporter's er's Phon esporter's	083 15 15 15 10 30900 10 (713)	er
9. Designated Facility Name and Site Address 10. Vppak Industrial Services USA Inc. 2759 BATTLEGROUND ROAD DEER PARK. TEXAS 77536	. US EPA ID Numbe		G. State Faci H. Facility's F	3	0567	
11A. HM 11. US DOT Description (including Proper Shipping Name, Number and Packing Group)	, Hazard Class, ID	12. Contain No.	ers 1	3. otal antity	14. Unit	II, Waste No.
FEG. WASTE FLAMMABLE LIQUID. N.D.S., UN1993, PGII, (XYLENE, IOLÜENE)	3,	0	DM · ·	T.	P 00:	01 21-20 6 -1
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15. Special Handling Instructions and Additional Information CLASS 3 PLACARDS REQUIRED. LDR REQUIRED. USE PROTECTIVE EQUIPMENT WHEN HANDLING	THIS WASTE.		<i>CETERE</i> WANTEST	νcε - #	345 DO	ne 79
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17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name	Signature				Month	Date Day Year
19. Discrepancy Indication Space Not ALL WAST	E WAS REV	MONED	From	TAIR	. TA	vu
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AB REALS COMMISSION ON ENVIRONMENTAL QUALITY P.O. Box 13087 Austin, Texas 78711-3087

UNIFORM HAZARDOUS	Generator's US EPA ID No.	Manifest Document No	2. Pa	ATTENDED IN			the shad	
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d. Generator's Name and Mailing Address The Lubrizol Corporation 12801 Bay Area Blvd. (AT Pasadena, TX 77507-1397		1 8		ate Manife 3 4 ate Gener	450	007	The Property of the Control of the C	
Generator's Phone (281)479-28			ITACT	7	303	25		
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. Transporter 2 Company Name	8. US EPA	ID Number	图 200 图 200	ate Transp		Calculation of the		
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ENCLOSURE 3 GENERAL NOTICE LETTER REGARDING CES ENVIRONMENTAL SERVICES, INC.- HOUSTON HOUSTON, HARRIS COUNTY, TEXAS

ENTITIES TO WHICH THIS GENERAL NOTICE WILL BE MAILED

The Lubrizol Corporation

Advanced Aromatics, L.P.

AMTEX Machine Products, Inc.

Andergauge Drilling Systems

Arkema Inc.

Ball Corporation

Canrig Drilling Technology Ltd.

Century Asphalt (Humble) d/b/a for Baytown Asphalt Materials, Ltd.

Champion Technologies (Merged into Nalco Company)

Citgo Petroleum Corporation (Citgo Refinery)

Cross Oil & Refining & Marketing, Inc..

Dover Corporation - Cook Compression (C Lee Cook)

Evalca Company of America

KMCO, Inc. (new name is Ramsey Properties, L.P.)

PGI International. LTD (merged into Parker-Hannifin Corporation)

Philip Reclamation Services Houston, LLC

Plaquemine Point Shipyard, Sunshine, LA

PPG Industries, Inc.

Praxair, Inc.

Proler Southwest

Quest Chemical Corporation

RasGas in Qatar @ KMTEX

Sierra Chemical Corporation

Skyhawk Chemicals, Inc.

Smithfield BioEnergy, LLC

Sun Coast Resources, Inc.

- T. T. Barge Mile (Barge Mile 183, 237)
- T. T. Barge Cleaning Mile 183, Inc. (d/b/a T.T. Barge [Mile 183])
- T. T. Barges Services Mile 237 LLC (d/b/a T T Barge Mile [Barge Mile 237])

T.T. Barge (Mile 237)

T3 Energy Services-Cypress

Taber Extrusions

Targa Midstream Services LP

Tenaris Coiled Tube, LLC (Beitway 8) a-k-a Precision Tube

Texas Oil Tools, NOV (Conroe)

Texas Water Management
Total Petrochemicals, Inc. - Port Arthur
Transmontainge Product Service
Valero Refining-Texas, L.P. (d/b/a Valero Refining Co of Texas)
ZaCh System Corporation (Ampac)

ENCLOSURE 4 GENERAL NOTICE LETTER REGARDING CES ENVIRONMENTAL SERVICES, INC.- HOUSTON HOUSTON, HARRIS COUNTY, TEXAS

SMALL BUSINESS RESOURCES FACT SHEET



Office of Enforcement and Compliance Assurance

INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Compliance Assistance Centers

(www.assistancecenters.net)

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

Agriculture (www.epa.gov/agriculture or 1-888-663-2155)

Automotive Recycling Industry (www.ecarcenter.org)

Automotive Service and Repair (vww.ccar-greenlink.org or 1-888-GRN-LINK)

Chemical Industry (www.chemalliance.org)

Construction Industry (www.cicacenter.org or 1-734-995-4911)

Education (www.campuserc.org)

Healthcare Industry (www.hercenter.org or 1-734-995-4911)

Metal Finishing (www.nmfrc.org or 1-734-995-4911)

Paints and Coatings (www.paintcenter.org or 1-734-995-4911)

Printed Wiring Board Manufacturing (www.pworc.org or 1-734-995-4911)

Printing
(www.pneac.org or 1-888-USPNEAC)

Transportation industry (www.transource.org)

Tribal Governments and Indian Country (www.epa.gov/tribal/compliance or 202–564-2516)

US Border Environmental Issues (www.bordercenter.org or 1-734-995-4911)

The Centers also provide State Resource Locators (www.envcap.org/statetools/index.cfm) for a wide range of topics to help you find important environmental compliance information specific to your state;

EPA Websites

EPA has several internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the internet at your business, many public libraries provide access to the internet at minimal or no cost.

EPA's Home Page www.epa.gov

Small Business Gateway www.epa.gov/smallbusiness

Compliance Assistance Home Page www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance www.epa.gov/compliance

Voluntary Partnership Programs www.epa.gov/partners

Office of Enforcement and Compliance Assurance: http://www.epa.gov/compliance



Hotlines, Helplines & Clearinghouses

(www.epa.gov/epahome/hotline.htm)

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. A few examples are listed below:

Clean Air Technology Center (www.epa.gov/th/cate or 1-919-541-0800)

Emergency Planning and Community Right-To-Know Act (www.epa.gov/superfund/resources/infocenter/epcra.htm-or 1-800-424-9346)

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information. (www.epa.gov/sbo or 1-800-368-5888)

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers (www.epa.gov/clearinghouse)

National Response Center to report oil and hazardous substance spills. (www.nrc.uscg.mil or 1-800-424-8802)

Pollution Prevention Information Clearinghouse (www.eps.gov/opplintr/ppic or 1-202-566-0799)

Sale Drinking Water Hotline (vww.epa.gov/salewater/hotline/index.html or 1-800-426-4791)

Stratospheric Ozone Refrigerants Information (www.epa.gov/ozone or 1-800-296-1996)

Toxics Assistance information Service also includes asbestos inquiries, (1-202-554-1404)

Wetlands Helpline (www.epa.gov/owow/wellands/welline.html or 1-800-832-7828)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or the following two resources:

EPA's Small Business Ombudsman (www.epa.gov/sbo or 1-800-368-5888)

Small Business Environmental Homepage (www.smallbiz-enviroweb.org or 1-724-452-4722)

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated.

businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses:

The Small Business Compliance Policy (www.epa.gov/compliance/incentives/smallbusiness)

Audit Policy (www.epa.gov/compliance/incentives/auditing)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an SBA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees, or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards. you still have the duty to comply with the law, including providing timely responses to EPA information requests. administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.